

JOSHUA DEAL
NJ Bar No. 161572015
GREENSPOON MARDER LLP
590 Madison Avenue, Suite 1800
New York, NY 10022
(212) 524-5075
joshua.deal@gmlaw.com

BETH-ANN E. KRIMSKY
Fla. Bar No. 968412
*Pro Hac Vice Anticipated**
JAMEY R. CAMPELLONE
Fla. Bar No. 119861
*Pro Hac Vice Anticipated**
GREENSPOON MARDER LLP
200 East Broward Blvd., Suite 1800
Fort Lauderdale, Florida 33301
Tel: (954) 527-6296
Fax: (954) 333-4027
beth-ann.krimsky@gmlaw.com
clemencia.corzo@gmlaw.com
jamey.campellone@gmlaw.com

Attorneys for Defendants,
The Credit Pros International Corporation
and Jason Kaplan

<p>JOSHUA CHAMPION, Plaintiff, v. THE CREDIT PROS INTERNATIONAL CORPORATION, a New Jersey corporation, and JASON KAPLAN, Defendants.</p>	<p>UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY CASE NO.: 2:21-cv-10814-CCC-JBC</p>
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NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that Defendants The Credit Pros International Corporation and Jason Kaplan, by and through their undersigned counsel, will move the Honorable Claire C.

Cecchi, U.S.D.J. on August 16, 2021 for an Order, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the complaint [D.E. 1] in its entirety.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Defendants rely upon the brief submitted with this Notice of Motion and upon all pleadings and proceedings on file in this action.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting this motion is attached.

Dated: July 20, 2021.

Respectfully submitted,

By: /s/ Joshua Deal
JOSHUA DEAL
BETH-ANN E. KRIMSKY*
JAMEY R. CAMPOLLONE*
GREENSPOON MARDER LLP
*Attorneys for Defendants,
The Credit Pros International Corporation
and Jason Kaplan*

CERTIFICATE OF SERVICE

I hereby certify that I caused Defendants' Notice of Motion to Dismiss, Brief in Support, and Proposed Order to be filed through the ECF system and notice will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joshua M. Deal

Joshua M. Deal